

EXHIBIT 1



Martin McMahon <mm@martinmcmahonlaw.com>

Re: Wael Jelaidan

Martin McMahon <mm@martinmcmahonlaw.com>
To: "Haefele, Robert" <rhaefele@motleyrice.com>

Thu, Feb 15, 2018 at 4:18 PM

Dear Bob:

As I promised I would get back to you in response to the issues that you raised in your recent email, I regret to inform you that for whatever reason I have not been able to speak with Mr. Jelaidan's attorney based in Jeddah, Bassim Alim. I have sent him a lot of emails and tried to tell him what the status of things are. Now, I guess I need to know if your primary objective is to try to set up a deposition so that you can pose questions to Wael concerning various issues. That is something I thought I would have been able to discuss with Attorney Alim, but I have been unable to do so at this time.

If you can, why don't you discuss this matter with your co-counsel and see what dates you would want to depose him regarding various topics, which both you and I have touched upon? If my services are terminated, of course, I will not be in the dialogue. But if you give me deposition dates, perhaps I can serve at least a limited role and start some sort of dialogue about setting up a deposition via Skype. The last time I checked, he is under house arrest and he is confined to the Kingdom, so obviously a deposition in London could not take place.

Please get back to me with respect to some deposition dates, and I will see what I can do to facilitate that matter if indeed I am still serving as Mr. Jelaidan's attorney. The issue of my continuing representation might be one of the reasons it's taken a while for Attorney Alim and Mr. Jelaidan to meet and confer on that issue. In any case, I told you that I'd be back to you on Thursday, and I honestly thought I would have more definitive news for you.

I look forward to hearing from you regarding scheduling a Skype deposition.

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